

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

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JOSHUA WINER,

Civil Action No.: 1:25-cv-02329-TWT

Plaintiff,

v.

UMAYMAH MOHAMMAD, et. al.,

Defendants.  
-----X

**CONSENT MOTION FOR (I) EXTENSION OF TIME TO ANSWER OR  
OTHERWISE RESPOND TO COMPLAINT AND (II) TO EXTEND TIME  
FOR PLAINTIFF’S RESPONSE TO ANY MOTION TO DISMISS**

Pursuant to Fed. R. Civ. P. 6(b) and Local Rule 7.1, Plaintiff Joshua Winer (“Plaintiff”) and Defendants Umaymah Mohammad and Rupa Marya (collectively, “Defendants”) file this consent motion to extend the time for Defendants to file an answer or otherwise respond to Plaintiff’s operative amended complaint through August 28, 2025, and for Plaintiff to be permitted to respond to any motion to dismiss filed by Defendants as to the complaint through November 7, 2025.

1. Umaymah Mohammad's waiver of service was filed with this Court on June 12, 2025. Her responsive deadline was July 21, 2025.
2. Rupa Marya's waiver of service was filed with this Court on July 1, 2025. Her responsive deadline is August 11, 2025.

3. Given defense counsel's schedule and the volume of the complaint, Plaintiff has agreed to stipulate to extend the time for Defendants to file an answer or motion to dismiss through August 28, 2025.
4. Counsel for Defendants has agreed and stipulated to extend the time for Plaintiff to respond to Defendants' anticipated motions to dismiss, so that Plaintiff will have through November 7, 2025 to file his response.
5. This consent motion is made in good faith and no party will be prejudiced as a result of the extension.
6. A proposed order reflecting the agreed-upon extension of time is submitted with this motion.

Dated: August 13, 2025

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Counsel for Umaymah Mohammad  
and Rupa Marya

Respectfully submitted,

**WEISSMANN ZUCKER EUSTER +  
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*Counsel for Plaintiff*

**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(B) in Times New Roman 14-point typeface.

Dated: August 13, 2025

/s/Jonathan Wallace  
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Plaintiff,

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Defendants.

**[PROPOSED] ORDER GRANTING CONSENT MOTION TO EXTEND  
TIME TO RESPOND TO COMPLAINT AND PLAINTIFF’S DEADLINE  
TO RESPOND TO MOTION TO DISMISS**

THIS MATTER is before the Court upon Plaintiff Joshua Winer and Defendants Umaymah Mohammad and Rupa Marya's Consent Motion for Extension of Time to Answer or Otherwise Respond to Complaint and to Extend Time for Plaintiff’s Response to a Motion to Dismiss (the “Motion”). Having considered the Motion and for good cause shown, it is hereby

ORDERED AND ADJUDGED that:

1. The Motion is GRANTED.
2. Defendants Mohammad and Marya shall file their responses to the amended complaint on or before August 28, 2025.

3. If Defendants file a Motion to Dismiss the operative complaint,  
Plaintiff shall have through November 7, 2025 to file his response to  
the motion.

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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THOMAS W. THRASH, JR.  
United States District Judge

Presented by:

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